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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PORTIA LEMMONS,) No. C 07-1198 MEJ

Plaintiff,)

v.)

UNITED STATES OF AMERICA,)

Defendant.)

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINES**

STIPULATION

1. On October 31, 2007, pursuant to the parties' stipulation, the Court filed an order extending the mediation deadline in the above-captioned matter for 90 days.

2. On February 27, 2008, at plaintiff's request, the parties stipulated to extend the mediation and discovery deadlines, and the pretrial and trial dates to allow plaintiff's counsel time to recover from injuries he sustained during an accident in January 2008.

3. On March 3, 2008, the Court filed an order extending the mediation and discovery deadlines, and pretrial and trial dates as follows:

Deadline for ADR Mediation: May 30, 2008

Disclosure of Expert Witnesses: June 30, 2008

Rebuttal Expert Witnesses: July 14, 2008

Discovery Cut-Off: August 4, 2008

Dispositive Motions Filing Deadline: August 21, 2008

Hearing on Dispositive Motions: September 25, 2008

Joint Pre-trial Conference Statement: December 15, 2008

Pre-trial Conference: January 8, 2009

Trial Date: February 9, 2009

4. The parties have identified several ongoing discovery issues. Given the outstanding discovery issues, the parties seek an extension of the deadlines for expert and fact discovery to seek resolution of their discovery disputes. The parties stipulate to extend the expert and fact discovery deadline, and deadline for dispositive motions as follows:

Disclosure of Expert Witnesses: September 30, 2008

Rebuttal Expert Witnesses: October 20, 2008

Fact Discovery Cut-Off: November 3, 2008

Expert Discovery Cut-Off: November 21, 2008

Deadline for filing Dispositive Motions: November 6, 2008

Last Day for Hearing Dispositive Motions: December 11, 2008

IT IS SO STIPULATED.

DATED: June 20, 2008

Respectfully submitted,

JOSEPH P. RUSSONIELLO
United States Attorney

/s/
JENNIFER S WANG
Assistant United States Attorney

1 DATED: June 19, 2008

2 DUANE & SELTZER, LLP

3 /s/ Richard P. Duane
4 Attorney for Plaintiff

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6 ~~PROPOSED~~ ORDER

7 Pursuant to the parties' stipulation and good cause having been shown, it is ordered that:

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- 9 1. The deadline for disclosure of expert witnesses is extended to September 30, 2008.
 - 10 2. The deadline for disclosure of rebuttal expert witnesses is extended to October 20, 2008.
 - 11 3. The deadline for completion of fact discovery is extended to November 3, 2008.
 - 12 4. The deadline for completion of expert discovery is extended to November 21, 2008.
 - 13 5. The deadline for filing dispositive motions is extended to November 6, 2008.
 - 14 6. The last day for the hearing on dispositive motions is extended to December 11, 2008.
- 15

16 IT IS SO ORDERED.

17 DATED: June 23, 2008

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19 MARIA ELENA JAMES
20 United States Magistrate Judge